| 1 | RENE L. VALLADARES | | |
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| 2 | Federal Public Defender Nevada State Bar No. 11479 | | |
| 3 | ADEN KEBEDE Assistant Federal Public Defender | | |
| 4 | 411 E. Bonneville, Ste. 250 Las Vegas, Nevada 89101 | | |
| 5 | (702) 388-6577/Phone (702) 388-6261/Fax | | |
| | Aden_Kebede@fd.org | | |
| 6 | Attorney for Yoandry Benitez-Castellano | | |
| 7 | | | |
| 8 | UNITED STATES DISTRICT COURT | | |
| 9 | DISTRICT OF NEVADA | | |
| 10 | UNITED STATES OF AMERICA, | 2:21-cr-00221-JCM-BNW | |
| 11 | Plaintiff, | STIPULATION TO DISMISS PETITION TO MODIFY | |
| 12 | v. | CONDITIONS OF RELEASE WITHOUT PREJUDICE | |
| 13 | YOANDRY BENITEZ-CASTELLANO, | | |
| 14 | Defendant. | | |
| 15 | | | |
| 16 | Pursuant to the Court's June 1, 2022, Minute Order, Jason M. Frierson, | | |
| 17 | United States Attorney, and Melanee Smith, Assistant United States Attorney, | | |
| 18 | counsel for the United States of America, and Rene L. Valladares, Federal Public | | |
| 19 | Defender, and Aden Kebede, Assistant Federal Public Defender, counsel for | | |
| 20 | Yoandry Benitez-Castellano, hereby submit the following stipulation. | | |
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| 1 | 1. On March 09, 2022, Mr. Benitez appeared before the Honorable | |
|----|---|----------------------------------|
| 2 | Judge James C. Mahan for a hearing on a request to modify conditions of release | |
| 3 | to require him to stay at a halfway house. After hearing arguments, the Court | |
| 4 | stayed the matter for 90 days in order for Mr. Benitez to get back into compliance. | |
| 5 | 2. Since that hearing, Mr. Benitez-Castellano has been doing well and | |
| 6 | following the terms of his supervised release. As much, the parties have agreed to | |
| 7 | dismiss the request to modify the conditions of his release. | |
| 8 | 3. The parties request that the June 8, 2022, hearing be vacated | |
| 9 | because of this resolution. | |
| 10 | | |
| 11 | DATED this 7 th day of June 2022. | |
| 12 | RENE L. VALLADARES | JASON M. FRIERSON |
| 13 | Federal Public Defender | United States Attorney |
| 14 | /s/ Aden Kebede | /s/ Melanee Smith |
| 15 | ADEN KEBEDE | By MELANEE SMITH |
| 16 | Assistant Federal Public Defender | Assistant United States Attorney |
| 17 | Dated: June 7, 2022. | Xellus C. Mahan |
| 18 | | UNITED STATES DISTRICT JUDGE |
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that he is an employee of the Federal Public Defender for the District of Nevada and is a person of such age and discretion as to be competent to serve papers.

That on June 7, 2022, he served an electronic copy of the above and

foregoing, STIPULATION TO DISMISS PETITION to MODIFY

CONDITIONS OF RELEASE WITHOUT PREJUDICE, by electronic service

(ECF) to the person named below:

JASON M. FRIERSON United States Attorney MELANEE SMITH Assistant United States Attorney 501 Las Vegas Blvd. South Suite 1100 Las Vegas, NV 89101

/s/Brandon Thomas

Federal Public Defender Employee